Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton Executive Director Southern District of New York Jennifer L. Brown Attorney-in-Charge

September 24

The Honorable Richard M. Berman United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

> Re: <u>United States v. Anderson Garcia</u> 21 CR 402 (RMB)

Dear Judge Berman:

SO ORDERED:
Date:

9/27/21

Richard M. Berman, U.S.D.J.

With the consent of the Government, I write to request an extension of the deadline for pretrial motions in the above-referenced matter. I am still in the process of reviewing discovery, including the production of electronic devices disclosed to the defense yesterday evening. I need additional time to review the voluminous discovery with Mr. Garcia before filing pretrial motions. Moreover, I begin trial on October 4 and will have limited opportunity to review the discovery with Mr. Garcia. A deadline extension of approximately 30 days should provide sufficient time to review the discovery and file any pretrial motions. Therefore, with the Government's consent, I respectfully request that the Court endorse the following schedule:

- Mr. Garcia's pretrial motions due by October 28, 2021.
- Government response by November 11, 2021.
- Mr. Garcia's reply by November 18, 2021.

Respectfully submitted,

/s

Zawadi Baharanyi Assistant Federal Defender 917-612-2753

cc: Jun Xiang
Rebecca Dell
Assistant United States Attorneys